

DIVIDEND ASSETS CAPITAL, LLC

INVESTMENT ADVISORS

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Form ADV Part 2A

Investment Adviser Brochure

November 19, 2026

This brochure provides information about the qualifications and business practices of Dividend Assets Capital, LLC ("DAC"). If you have any questions about the contents of this brochure, please contact DAC's Chief Compliance Officer, at 843.645.9700 and/or complianceteam@dacapitalsc.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

DAC is an investment adviser registered with the SEC under the Investment Advisers Act of 1940. Registration does not imply any certain skill or training.

Additional information about Dividend Assets Capital, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

Since DAC's annual update on March 31, 2026, the following material updates have been made.

Item 5 – Fees and Compensation: Updated the fee schedule to eliminate the separate fee breakdown applicable to fixed income assets and to clarify the firm's advisory fee structure.

In addition, the brochure was revised to make formatting, organizational, and other non-substantive changes intended to improve readability and consistency. These additional changes were not material and did not alter the nature of the Firm's advisory services, fees, conflicts of interest, or business practices.

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Item 4: Advisory Business

Dividend Assets Capital, LLC ("**DAC**"), a limited liability company incorporated under the laws of the State of South Carolina, has been a registered investment adviser with the U.S. Securities and Exchange Commission since January 2004. Registration does not imply any certain skill or training. DAC was founded in 2003 and was formerly named Dividend Growth Advisors, LLC. The name change was made effective February 27, 2012. DAC is a wholly-owned subsidiary of Dividend Assets Capital Holdings, Inc. (DACH) which was formed on September 30, 2014, for the purpose of acquiring DAC and to facilitate a transaction to form an Employee Stock Ownership Plan (ESOP), which owns 100% of the outstanding shares of DACH.

GreatBanc Trust Company serves as DACH's ESOP trustee and owner of DAC's equity on behalf of DAC's employees. Over time, the ESOP will allocate the shares of DACH that it owns to the employees of DAC.

As of December 31, 2025, DAC had client assets it managed of $540,807,741. Of that total amount, DAC has $540,807,741 in regulatory assets under management on a discretionary basis. Client assets DAC manages that are not included in its regulatory assets under management are $116,435,237. Regulatory assets under management are calculated consistent with the methodologies applied in DAC's Form ADV Part 1. DAC does not have discretion for certain securities held by some of DAC's clients; however, the securities are held in discretionary accounts and therefore the assets are included in the calculation of assets under management. The value of these securities as of December 31, 2025, was $14,188,608.

Types of Advisory Services and Investments

DAC is an investment advisory firm in which its primary business is providing discretionary advisory services to clients through private client services, sub-advisory services and dual contract private client services.

DAC generally invests assets in client accounts in dividend-paying stocks that have shown consistent dividend increases in prior years and Master Limited Partnerships ("MLPs") that have maintained or increased distributions. Where appropriate to meet specific client needs and/or risk preferences, DAC may also invest in Treasuries, Corporate and/or Municipal bonds, as well as mutual funds, and ETFs. Clients may direct specific investments that may not be in the DAC strategy and therefore are not followed by DAC's team of portfolio managers and research analysts.

Clients who wish to impose restrictions on certain securities, types of securities, or industries, etc., should notify DAC. Once agreed upon, it is the client's responsibility to inform DAC in writing when a change is desired or made and/or the restriction(s) is (are) no longer valid.

DAC clients include those with whom DAC has a direct contractual relationship through DAC's Client Advisory Agreement, those who have enrolled in asset-based wrap fee programs sponsored by an unaffiliated dual-registrant broker-dealer/investment adviser, and clients where DAC acts as a sub- adviser.

Separate Accounts

DAC's advisory services to separately managed accounts are customized based on each separate account client's return expectations, tolerance for risk, tax situation, volatility, and the need for liquidity. During initial and on-going discussions with each client, DAC develops the personal investment profile that includes specific client information and a general profile of the client's risk tolerance, recommended investment strategy, income requirements, distribution requirements and any account restrictions.

As mentioned previously, clients may direct specific investments that may not be in the DAC strategy and therefore are not followed by DAC's team of portfolio managers and research analysts.

Sub-Advisory Services

A Sub-Advisory relationship occurs when DAC contracts with another, unaffiliated Registered Investment Adviser, Broker Dealer, Registered Representative or Custodian to provide discretionary portfolio management services on a continuous basis to their advisory clients. DAC provides sub-adviser services to client portfolios consistent with the client's stated goals, objectives and risk tolerances provided by the client or the client's financial representative.

For such accounts, DAC will place, in accordance with the written agreement with client, orders for the execution of all investment transactions for clients with the specified broker-dealer or the sub-adviser's platform(s). In sub-adviser arrangements with smaller custodian banks, DAC will trade these accounts with its trading brokers. The sponsor of these sub-advisor programs generally provides the clients with all servicing including, but not limited to, reporting.

Sub-Adviser to a Registered Investment Company (Exchange Traded Fund ("ETF"))

DAC is an investment sub-adviser to the DAC 3D Dividend Growth ETF, a registered investment company (i.e., an exchange traded fund ("ETF")). As a sub-adviser to the ETF, DAC is obligated to follow the investment objectives of the ETF as mandated in the ETF Prospectus and as described in the sub-adviser agreement that DAC has executed with EA Series Trust. The ETF may hold the same or substantially similar investments as clients in DAC's separately managed accounts and may trade in aggregated blocks with DAC's separate accounts, sub-advised (including Wrap Programs) and dual contract clients. However, the ETF may also trade at different times than separately managed accounts depending on cash flows, weightings, and other financial reasons. The timing of these trades and price execution may differ from separate account clients.

EA Series Trust is not affiliated with DAC and the management of this account and trading activity is solely at the discretion of DAC and subject to the investment sub-adviser agreement between DAC and EA Series Trust.

Wrap Fee Programs

DAC acts as a portfolio manager for several wrap fee programs in which the client pays one fee to the wrap program sponsor for all services associated with the management and execution of their account. DAC does not sponsor any wrap fee program. There are several differences between how DAC manages wrap fee accounts and other accounts. One of the primary differences is that the trading of a wrap fee account is typically directed to the sponsor (or an affiliate of the sponsor) of the wrap program. DAC may not have, depending on the structure of the wrap program, primary responsibility for maintaining on- going relations with the clients within the wrap program. DAC receives a portion of the total wrap fee paid to the wrap program sponsor for its portfolio management services. DAC does not solicit these clients or provide client statements or reporting.

Unified Managed Account Program ("UMA")

Institutional SMA advisor clients retain DAC so that their underlying retail clients can access DAC's model portfolios for their own investment accounts. DAC's services to some of these separately managed account ("SMA") programs include development and delivery of the model portfolio, research, updates and monitoring of the model portfolio, and trade executions on behalf of the underlying client accounts in response to model updates. DAC does not enter into a direct relationship with the underlying clients of the SMA programs and does not provide account-specific performance reporting services to those underlying program participant clients. In these relationships, DAC does not have investment discretion over the investment adviser's client accounts, nor does DAC communicate directly with the investment adviser's clients. DAC receives an investment management fee directly from the adviser.

Different institutional SMA advisors and its UMA advisor clients also retain DAC in order that their underlying retail clients can access the model portfolio for their investment accounts. However, DAC's services to these other SMA and UMA programs include only development of the model portfolio, research, updates and monitoring of the model portfolio, and notice only of model updates. For these program clients, DAC does not provide trade execution services in response to model updates and does not provide account-specific performance reporting services. DAC does not enter into a direct relationship with the underlying clients of the UMA and SMA programs.

Dual Contract Arrangements

DAC acts as a portfolio manager for dual contract programs in which the client hires both a financial advisor and DAC to manage their assets. Generally, the client's investment objective is provided by the financial advisor to DAC. These clients sign DAC's Client Advisory Agreement, have the same obligations under the DAC agreement as would a direct client of DAC, and may pay fees less than DAC's separate account clients due to fewer servicing requirements as these are fulfilled by the other financial adviser. All trades for these accounts are directed to the financial advisor's trading platform and may be aggregated alongside DAC's other clients. Under the dual contract arrangement, DAC will generally meet with or have discussions with the client's financial advisor, rather than the client, on a regular basis.

In the course of managing the separate accounts, sub-advised, UMA programs, dual contract and wrap accounts, DAC may take different positions in the same or related securities for different clients. It is possible that DAC could sell certain securities in one client account, while another client account will continue to hold the same security.

In addition, clients may have investment objectives, strategies, time horizons, tax considerations, and risks that differ from one another. The portfolio managers' investment decisions for each client are based on these factors, and other relevant investment considerations applicable to that particular client. Consequently, the portfolio managers may purchase or sell securities for one client, but not all clients, and the performance of securities purchased for one client may vary from the performance of securities purchased for other clients.

Real, potential, or apparent conflicts of interest may arise when a portfolio manager has day-to-day investment responsibilities with respect to more than one of its types of clients (e.g., separate accounts, sub-adviser accounts, dual contract, or wrap). For example, a portfolio manager may have conflicts of interest in allocating management time and resources among the different clients advised.

Financial Planning Services

DAC offers financial planning services for a fee ranging from $200 to $500 per hour. DAC does not provide legal or accounting services. The financial plans are for budgeting and retirement planning purposes and are provided only as guidelines. Clients or prospects are not obligated to accept or follow the advice resulting from the plan provided by DAC, and they may take the plan to another investment manager if they choose.

The primary focus of a financial plan is to analyze retirement income goals, budget/spending analysis and to establish retirement income expectations. The financial planning service does not involve implementing transactions on the client's behalf or the active and ongoing management of the client's investments. It is the sole responsibility of the client or prospective client to determine whether to implement the financial plan. To the extent that the client or prospective client decides to implement the investment strategy of the plan with DAC, an investment advisory agreement must be executed with DAC. DAC's financial planning service offering is not mandatory for all clients and prospects. There may be one-off cases where financial plans will be developed for clients and some portfolio managers will not use the tool at all.

A financial plan is developed based on information that is provided to DAC by the client or prospective client. This information may include, but is not limited to, the client's financial objectives, risk tolerance, financial resources, family situation and future financial goals. Documents requested by DAC to develop the plan could include tax returns, financial statements, bank statements, list of investments, insurance policies, etc. It is important that the information provided to DAC is accurate and complete. DAC is not responsible for verifying the accuracy of the information provided by the client or prospective client.

Life Insurance Consultation

DAC is registered as an insurance agency with the State of South Carolina. In connection with DAC's financial planning services, DAC may consult with clients on matters related to life insurance. DAC has an agreement with an independent life insurance underwrite

("Underwriter") that will provide insurance evaluations and services to DAC clients who have an interest in life insurance coverage. DAC does not structure or recommend specific life insurance products to clients. If a client elects to obtain insurance coverage through the Underwriter, DAC and the Underwriter have an agreement that the Underwriter will share commissions with DAC.

Cash Management Services

DAC makes available to clients the Cantor Fitzgerald Cash management program offered by StoneCastle Network, LLC ("StoneCastle"). This program allows customers to place funds in deposit accounts at banks, savings institutions, and credit unions (collectively, "Insured Depositories") where such accounts are insured by the Federal Deposit Insurance Corporation ("FDIC") or National Credit Union Administration, whichever is applicable. Funds are deposited within StoneCastle's network of Insured Depositories. DAC earns a fee from StoneCastle if clients participate in this program, which gives DAC an incentive to recommend that you participate in the program.

Item 5: Fees and Compensation

Separate Accounts

DAC's standard fee schedules for its Separate Accounts are shown below and are based on a percentage of assets under management. For the purpose of determining fees, unsupervised assets held in the client accounts will be excluded from the fee calculation. The annual fee for portfolio management services will generally be charged monthly or quarterly using the market value of the securities and cash in the client's account at the end of the billing period or from the time the assets are contributed to the end of the billing period according to the following schedule:

Assets Under Management	Annual Fee (%)
First $2 million	0.85%
Next $3 million	0.70%
Next $5 million	0.60%
Over $10 million	0.50%

A minimum of $500,000 of assets under management is required for these services. DAC reserves the right to increase or decrease the minimum account size and to negotiate the fees. DAC may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

The specific manner in which fees are charged by DAC is established in the Client Advisory Agreement with DAC. Clients will be invoiced in arrears, unless otherwise agreed to and noted on the Client Advisory Agreement. Clients may elect to be invoiced directly for fees or may authorize DAC to directly debit fees from the client's account(s).

Due to the timing of billing, accounts opened or closed during a calendar month or quarter may be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will

be refunded, and any earned, unpaid fees will be due and payable. These fees may be billed separately and may not be debited from a client's account.

Sub-Advisory Relationships – ETFs

DAC has a sub-advisory agreement with EA Series Trust and receives investment management fees to manage DAC 3D Dividend Growth ETF ("the ETF"). The fee arrangement for the ETF is described in the Fund's prospectus and Statement of Information ("SAI").

DAC may, when deemed suitable, invest some or all of the client's assets in the sub-advised ETF. DAC clients whose accounts are invested in the Fund will pay only those investment management fees charged to investors by the ETF. The value of the ETF shares held in the client's account is excluded for purposes of determining the fee DAC charges in separately managed accounts.

Financial Planning

DAC may charge a fee for financial planning services ranging from $200 to $500 per hour. The specific manner in which fees are charged by DAC is established in the Client engagement letter with DAC. Clients will be invoiced in arrears, unless otherwise agreed to and noted on the engagement letter, at the end of each calendar month or quarter based upon the retainer or hours invested in financial services for the client's account at the end of the previous month or quarter. Clients may elect to be invoiced directly for fees or may authorize DAC to directly debit fees from the client's account(s).

Life Insurance

DAC may share commissions with an independent insurance underwriter for life insurance products provided to the client.

Cash Management Fees

DAC charges an annual fee of 0.10% of the value of the client's cash management account if a client participates in the Cantor Fitzgerald Cash management program. This fee will be deducted quarterly in arrears from the client's account by the account custodian. This fee is separate and in addition to DAC's portfolio management fee.

Additional Fee Information

It is DAC's policy to sometimes discount fees for non-profit organizations and at its discretion, DAC reserves the right to waive fees for a portion or all of its services and to increase or decrease the minimum account size it will accept. On a case-by-case basis, DAC may negotiate fees, account minimums and payment terms depending on a client's particular circumstances. Such negotiated terms may take into consideration factors such as, but not limited to, (i) the size of the aggregated-related party portfolio size, (ii) family holdings, (iii) low cost basis securities, (iv) certain passively advised investments, and/or (v) pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets,

type of portfolio, management needs, the degree of responsibility assumed, the complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation. Lower fees for comparable services may be available from other sources.

In addition to DAC's advisory fees, clients are also responsible for the fees and expenses charged by custodians and broker-dealers. Please refer to Item 12 of this Brochure for additional information. DAC is not directly compensated through these charges.

Pre-existing advisory clients are subject to DAC's minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship, amended Client Advisory Agreement with DAC or as otherwise agreed to between DAC and the client. Therefore, DAC's minimum account requirements and fees will differ among clients.

DAC will either invoice its clients or directly debit fees from the client's account with the custodian.

Where available, DAC uses readily available market prices and/or independent pricing sources to value clients' assets. Where market prices are not readily available, DAC provides fair valuations. Because this presents a conflict of interest, DAC has developed policies and internal pricing controls to verify that valuations represent fair market prices or fair valuations based on what it reasonably expects to realize upon a current sale.

Termination of the Advisory Relationship

Client Advisory Agreements may be terminated by either party, without cause, upon written notification as set forth in the Client Advisory Agreement, unless otherwise agreed to by both parties. Upon DAC's receipt of a client's written notice to terminate the Agreement, DAC will cease the management of the client's assets unless otherwise notified by the client. For example, in some cases, clients may notify DAC of their intent to terminate the relationship at a future date, but; request that DAC continue managing the account until further notice. Clients pay investment management fees prorated through the date that DAC ceases management of those assets. All custodial termination and transfer fees, if any, assessed by the client's custodian are the responsibility of the client, and are generally imposed by the custodian prior to the transfer of assets from the account managed by DAC.

Clients who participate in wrap programs may pay fees in advance due to the agreement the client has with the wrap program sponsor. It is the sponsor's responsibility to provide a prorated refund to the client for any prepaid fees in the event the client closes their investment account prior to quarter end.

Compensation for Sale of Securities or Other Investment Products

DAC does not accept compensation for the sale of securities or other investment products.

Item 6: Performance-Based Fees and Side-by-Side Management

DAC does not participate in performance-based fee arrangements (fees based on a share of capital gains or on capital appreciation of the assets of a client) or side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

Item 7: Types of Clients

DAC's clients include individuals, high net worth individuals, investment companies, pension and profit-sharing plans, trusts, estates, bank trust funds, charitable organizations, non-profits, and other business entities.

The minimum account size for all separately managed accounts is $500,000. DAC reserves the right to waive that requirement at DAC's discretion. Assets in related accounts may be grouped to satisfy the minimum account size requirement.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

Investment Strategies

DAC's Investment Committee is responsible for approving the applicable investment universes for all marketed strategies. The Investment Group, led by the chief investment officer, integrates a number of factors and criteria in its security evaluations and decisions. DAC offers its clients the opportunity to invest in one or more of DAC's strategies and customizes portfolios to meet individualized client needs.

Once the investment universe is provided, the Investment Committee oversees the implementation of a diversified model portfolio that is maintained by the chief investment officer and then customized by DAC's portfolio managers for individual clients.

The investment strategy for a specific client is based upon the objectives and risk tolerances identified by the client during portfolio consultations. Each portfolio is constructed to help meet clients' objectives, which may include greater income, tax considerations, and risk tolerances. Portfolio managers encourage frequent client communications and assist clients with objective and risk tolerance revisions such as lifestyle and economic changes warrant.

Master Universe

DAC begins the investment process by creating a master universe of investible securities. The master universe consists of companies that consistently increase dividends. In addition, there is an expectation the companies will pay a dividend during the subsequent 12 months.

DAC then uses the Master Universe to create the universes for the Dividend Growth Equity Strategy and Sustainable Dividend Growth Strategy. See below for the detailed description of each strategy.

Once the universes are created, DAC attempts to measure the intrinsic value of a security by

looking at economic and fundamental factors (including review of company balance sheets, cash flow, debt, and the management of the company itself) to determine the company's long-term investment potential.

DAC's analysis does not attempt to anticipate market movements. Market risk is always present, and the price of a security can move up or down, along with the overall market, regardless of the economic and financial factors considered in evaluating the security.

Dividend Growth Equity Strategy

DAC's approach attempts to select stocks that produce consistent dividend income and appreciation year over year. DAC believes that consistent earnings growth drives consistent dividend growth. Earnings provide the ability to pay and grow dividends. Over the long run, consistent earnings generally have had a positive influence on the price performance of a stock.

DAC primarily invests in high-quality U.S. companies with a history of significant, consistent dividend increases, which provide opportunities for capital appreciation and attractive, rising income. DAC begins the selection process by using the Master Universe and the Dividend Growth Equity Universe described above. Investments for DAC's equity portfolios are selected from many industries and sectors. While the majority of holdings are in large companies, DAC also offers diversification among small and mid-size companies. Each portfolio is constructed to help meet clients' objectives, which may include greater income, tax considerations and risk tolerances. DAC may also invest in foreign companies that meet the same criteria mentioned above. Currently, DAC will only purchase foreign securities that trade on a U.S. exchange or are available in ADR form. Foreign investing provides some diversification to the equity portfolio; but, it also carries additional risks including, but not limited to, currency, political, economic, and other country specific risks.

Sustainable Dividend Growth Strategy

DAC seeks to identify and invest in companies that have long term dividend growth records that have positive Environmental, Social and Governance characteristics as identified by the specific ESG metrics. DAC begins its investment process by screening the ESG qualified companies within the Master Universe. The strategy is designed for investors seeking companies with clear sustainable business practice goals and practices to benefit all stakeholders with long term growth of principal and income. DAC may also invest in foreign securities that meet the same ESG criteria mentioned above. Currently, DAC will only purchase foreign securities that trade on U.S. exchanges or are available in ADR form.

North American Midstream Energy Strategy

The universe of qualifying securities for the North American Midstream Energy Strategy includes high- quality Master Limited Partnerships (MLPs), C-Corporations and renewable asset operators that we believe offer investors the potential for higher income than traditional sources during challenging yield environments, plus distribution growth and capital appreciation. The universe is first screened for the payment of distributions/dividends for four consecutive quarters. To remain in the universe, the dividend/distribution must

increase or at least be maintained for the most recent quarter over the previous quarter, and for the preceding consecutive four quarters. The company is next screened for market capitalization to limit the exposure to small-cap companies which might pose liquidity concerns. Investments for this strategy are generally mid-stream energy MLPs, C-Corporations and renewable asset operators that generally offer enhanced yield and diversification, in a blended investment strategy. In selecting securities, DAC focuses on the fundamentals of the business, quality of distributions/dividends, credit profile and the attractiveness of the value of the security. DAC invests primarily in U.S. companies but can invest in companies located in Canada and Mexico that trade on U.S. exchanges.

Equity Income Strategy

The Equity Income Strategy selects stocks within the Dividend Growth and North American Midstream Energy Strategies utilizing securities from both the Dividend Growth Equity Universe and the North American Midstream Universe. DAC then optimizes the portfolio to deliver strong risk adjusted return that reduces active risks and provides opportunities for capital appreciation with attractive, rising income over the long run. Investments for DAC's Equity Income Strategy are selected across many industries and sectors. While the majority of holdings are in large companies, DAC also offers diversification among small, mid-size and international companies. Each portfolio is constructed to help meet clients' objectives, which may include asset growth, greater income, tax considerations and risk tolerances. Currently, DAC will only purchase foreign securities that trade on a U.S. Exchange or are available in ADR form. Foreign investing provides some diversification to the equity portfolio but also carries additional risk including, but not limited to, currency, political, economic, and other country specific risks.

Fixed Income

DAC does not currently maintain a specific fixed income strategy but will add positions for individual clients based on assessment and goal directions. DAC invests in debt instruments that must be rated as investment grade or higher for clients seeking a more conservative and/or diversified portfolio approach.

Fixed Income securities provide predetermined cash flow (coupon or interest rate) and a specified date for return of principal (maturity). Although there are many types of debt, DAC will trade generally, based on the client's goals and objectives, in:

- U.S. Treasury Securities
    - Bills – maturities of less than 1 year
    - Notes – maturities of 1 to 10 years
    - Bonds – maturities greater than 10 years

- Municipal Bonds – a debt security issued by a state, city, or county to help finance its capital expenditures, such as schools, infrastructures, and hospitals. Returns are free from federal tax and occasionally state tax. For this reason, these bonds carry a lower yield (return) than taxable bonds.

- Corporate Bonds – a debt security issued by a corporation for ongoing operations or expansion of the business. These bonds carry the highest risk of default but also provide the potential for higher yield (return) than government instruments. Corporate Bonds are taxable at the federal, state, and local levels.

Bonds usually trade in $1,000 lots or greater and may trade at a premium to original face value. Some bonds may trade through the NYSE Bonds order system, but many are still traded directly through a Designated Market Maker (DMM). To better diversify bond risks, DAC may suggest investments across bond type, issuers, and maturity duration. For the majority of the fixed income security investments, DAC uses Schwab. Schwab has access to fixed income listings from hundreds of dealers, which we believe provides DAC with the means to obtain the best execution price for all transactions. Clients may incur higher net costs than with other types of investments, especially when trading in small incremental lots.

Cash and Cash Equivalents

Dependent on the client's objectives and/or the Portfolio Manager's discretion, excess cash may be invested in a cash equivalent, such as a money market fund. The investment in the cash equivalent is determined by the custodian where the client's account is held, and the products offered by each custodian. As a result, the yield earned by each client will vary.

As mentioned in Item 4 above, DAC may also include ETFs and mutual funds as investment vehicles in a client's account. The investment in an ETF or mutual fund may be used as a proxy to provide similar exposure as the investment strategies listed above, or in an attempt to provide downside protection.

Risk of Loss

Investing in securities involves the risk of loss that clients should be prepared to bear. All investment programs have certain risks that are borne by the investor. DAC's investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- Dividend Cuts Risk: the risk that a company may cut its dividend, causing investors to sell the stock and the price to fall.

- Interest-Rate Risk: the risk that interest rates will rise to a higher level than the security holder is currently paid. Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds typically become less attractive, causing their market values to decline.

- Market Risk: the risk that the price of a security, bond, or mutual fund may change in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors, independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.

- Security Selection Risk: the risk that individual securities may decline in value due to

negative news or fundamental developments specific to the issuer. The rationale for selecting the security either may not be correct or the market may not recognize the value.

- Style Risk: the risk that the particular style of investing may be out of favor relative to other styles, such as Value vs. Growth investing or Small Capitalization vs. Large Capitalization investing, resulting in relative price declines and potential investment losses.

- Custodial Risk: the risk that the custodian of an account's assets was to go out of business, the account's assets may only be protected up to certain regulatory limits.

- Political Risk: the risk that political events such as war, terrorism, or change in government policy may cause the value of stocks to erode.

- Inflation Risk: the risk that the value of a dollar will not be worth as much as anticipated. That is, inflation will be higher than expected. This is also referred to as Purchasing Power Risk.

- Currency Risk: the risk that foreign investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as Exchange Rate Risk.

- Reinvestment Risk: the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.

- Business Risk: this risk is associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity, no matter what the economic environment is like.

- Liquidity Risk: the risk that an investor will be unable to buy or sell a security at a reasonable price at a certain point in time. This may occur if there is a limited quantity available or only a few market makers willing to trade. For example, U.S. Treasuries are quite liquid, while a micro-cap company with only a few hundred thousand shares outstanding is not.

- Financial Risk: the risk that excessive borrowing to finance a business' operations increases the risk of profitability because the company must meet the terms of its obligations in good and bad times. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a decline in market value.

- Credit Risk: the risk that a bond will default or be significantly downgraded by one of the recognized credit agencies. Although Treasury instruments are backed by the U.S.

government, there have been occasions in the past when a specific U.S. bond has been downgraded. Although DAC typically invests in investment grade debt, there is no guarantee that a bond will not be downgraded or default on the loan. Credit risk is generally a higher risk for corporate debt than government or municipal bonds.

- Call Risk: the risk that an issuer will repay (call) a bond prior to maturity. The issuer will return the investor's principal early. The investor will generally accept a lower interest payment when reinvesting that principal.

- Prepayment Risk: the risk that mortgage-backed bonds are usually subject to prepayment risk and the issuer will pay back the principal prior to maturity. This generally occurs when mortgage rates decline, and property owners refinance the debt at lower rates.

- Commodity Price Risk: the risk that the price of MLP units may be negatively impacted by fluctuations in commodity prices. A significant decrease in the production or supply or sustained reduced demand for natural gas, oil, or other energy commodities would limit revenue and cash flows of MLPs and, therefore, the ability of MLPs to make distributions to unitholders.

Master Limited Partnerships – Risk of Loss

Investors in Master Limited Partnerships (MLPs) should consult with their tax advisor regarding the tax consequences of investing in MLPs. Investors in MLPs should be aware that any changes in the current tax law could potentially result in future and retroactive tax consequences and should consult their tax advisors regarding any tax law changes. In addition, the conversion of MLPs to C-Corporations may also have tax implications to the investor.

Investors in MLPs may be required to file tax returns and pay tax in each state in which the MLP operates. Individual retirement arrangements, retirement plans, and other non-taxable entities investing in MLPs, may be required to report unrelated business taxable income (UBTI) and pay unrelated business income tax (UBIT). Tax reporting information for MLPs is provided to investors on an annual Schedule K-1 issued by an MLP.

The MLP's Schedule K-1 issue date may be after April 15. While most MLPs issue Schedule K-1s by March 31st, some investors may need to file tax extensions for income tax returns when an MLP has not issued its Schedule K-1 by April 15. MLPs are generally held in an investor's account to generate income. Investors in MLPs face the following investment risks:

- Concentration Risk: the risk that a portfolio of MLP investments is concentrated in the energy infrastructure sector. This narrow focus of MLPs may present considerably more risk than a diversified investment across numerous sectors of the economy. Some client portfolios may be very concentrated in MLPs over time.

- Tax Risk: the risk that reduction of basis may make liquidations cost-prohibitive from a tax perspective, increasing the percentage weighting in client portfolios.

- Market Risk: the risk that MLPs may exhibit high volatility, particularly during periods of economic stress, or due to other events affecting the particular sector or industry in which an MLP operates.

- Commodity Risk: the risk that while fundamentals are often delinked from the oil price, MLP unit prices tend to correlate to the price of oil and other commodities over time. This correlation may expose MLP unit prices to relatively high levels of price volatility relative to other equity instruments.

- Liquidity Risk: the risk that investments in MLPs may be relatively illiquid due to their unique investment strategy, asset concentration or other factors, despite the fact that MLPs are publicly traded. Lack of liquidity can negatively affect the ability to sell MLP units at a given time or price. MLPs have material risks related to high-debt-to-equity ratios and certain significant or unusual risks, including ownership controls associated with the limited partnership structure.

Other Investments

DAC may provide advice on investments held in a client's portfolio at the inception of the advisory relationship or on any investment for which the client requests advice. These investments may or may not be reviewed or recommended by DAC research analysts.

Item 9: Disciplinary Information

Neither Dividend Assets Capital, LLC nor its management personnel have been involved in any material legal or disciplinary events.

Item 10: Other Financial Industry Activities and Affiliations

DAC and its management persons are not engaged in other financial industry activities and have no other industry affiliations.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

DAC adopted a Code of Ethics that applies to the DAC's employees and officers ("supervised persons"). The Code of Ethics describes DAC's high standard of business conduct and fiduciary duty to DAC's clients. The general principles adopted by DAC for DAC and its personnel include, but are not limited to: (1) putting the clients' interest first at all times; (2) conducting all personal securities transactions in such a manner to be consistent with the Code of Ethics and to avoid any actual or potential conflicts of interest or any abuse of an employee's position of trust and responsibility; (3) not taking inappropriate advantage of their position; (4) treating all client information as confidential; and (5) maintaining independence in the investment decision-making process.

DAC employees are permitted to purchase and sell, for their own accounts, the same

securities DAC recommends to its clients, subject to the requirements of the Code of Ethics. The Code of Ethics sets forth procedures, limitations and prohibitions that govern employees' personal securities transactions in accounts held in their name as well as accounts in which they have indirect ownership.

Employees are required to pre-clear all personal securities transactions in securities not otherwise exempt under the Code of Ethics. Requests will be denied when the proposed personal transaction would be contrary to the Code of Ethics, including where DAC has purchased or sold the security (or has a pending trade for the security) for a client account that day, or the security has been purchased or sold in a client account within a blackout period. The above limitations do not apply to de minimis personal securities transactions of relatively larger market capitalization companies, as defined by the Code of Ethics, as these transactions should not impact market movement.

The Code of Ethics includes other restrictions and prohibitions on personal trading such as a limit on short- term trading and a ban on short sales of any security. In addition, there are limitations on the purchase of securities in an IPO or private placement.

DAC's Code of Ethics also contains policies on insider trading that include procedures designed to prevent trading or communications by employees that might constitute the misuse of material, non-public information.

The Code of Ethics includes provisions that govern gifts and entertainment given and received, as well as controls and requirements governing employee participation in other business activities such as involvement in non-profit entities, directorships, participation on boards, etc.

DAC believes that its Code of Ethics is reasonably designed to prevent certain personal securities transactions and other potential conflicts of interests between DAC, DAC's supervised persons and its clients. However, clients should be aware that no set of rules can possibly eliminate all actual or potential conflicts of interests.

DAC's employees must acknowledge the terms of DAC's Code of Ethics when hired, and annually, thereafter. Any individual not in compliance with the Code of Ethics may be subject to warnings, censure, and other disciplinary actions, including termination.

DAC's Code of Ethics is available by contacting the Chief Compliance Officer at 843.645.9700 or by email to complianceteam@dacapitalsc.com.

Item 12: Brokerage Practices

Broker Selection

Where it has full discretion, DAC's objective in the selection of broker-dealers and effecting portfolio transactions, is to seek to obtain the best combination of price and execution. The best net price, giving consideration to brokerage commissions, spreads, and other costs, is an important factor in the decision, but a number of other factors are also considered. Among the factors considered are: (1) DAC's knowledge of negotiated commission rates and spreads

currently available; (2) the nature of the security to be traded; (3) the size and type of the transaction; (4) the nature and character of the markets for the security to be purchased and sold; (5) the desired timing of the trade; (6) the activity existing and expected in the market for a particular security; (7) confidentiality and anonymity; (8) execution, clearance and settlement capabilities, as well as the broker-dealer's reputation and perceived soundness; (9) DAC's knowledge of broker-dealer's operational problems; (10) the broker-dealer's execution services rendered on a continuing basis and in other transactions; and (11) the reasonableness of spreads or commissions.

In seeking best execution for fixed income securities, DAC generally will not seek competitive bids. DAC utilizes Schwab's Fixed Income platform for the majority of its fixed income trades. We believe the Schwab Fixed Income Platform provides a competitive advantage for a firm of DAC's size. Schwab's Fixed Income Platform has access to fixed income listings from over 200 dealers, offering over 30,000 daily individual items, including more than 20,000 municipal securities. DAC believes the broker-dealers used for its fixed income transactions provide efficient and effective execution services and transaction costs in alignment with best execution.

Although DAC generally seeks competitive dealer spreads and commissions, it will not inevitably pay the lowest commission or commission equivalent, as this may prohibit DAC from obtaining an overall net cost more favorable under the circumstances.

DAC conducts ongoing due diligence on its trading partners and creates an internal list of "approved" trade execution services. DAC believes these trading partners provide efficient and effective execution services and transaction costs in alignment with best execution. While DAC has a reasonable belief that the trading partners provide best execution and competitive prices, DAC uses an independent firm to assist with analyzing best execution to evaluate trade costs within a peer universe.

In seeking best execution, the determining factor is not the lowest possible cost, but rather whether the transaction reasonably represents the best overall qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, transaction costs, and responsiveness.

Research and Other Soft Dollar Benefits

DAC does not have any formal soft dollar arrangements with the brokers DAC uses to execute trades. As such, DAC does not direct trades or have clients pay-up in commissions in exchange for research or non- research benefits. However, brokers may provide unsolicited research and non-research benefits which DAC may use in its investment decision and trading processes. Any such benefit utilized by DAC falls within the provisions of Section 28(e) of the Securities Exchange Act of 1934. See disclosure below in "Directed Brokerage – Other Economic Benefits".

Brokerage for Client Referrals

It is common for sub-advisers, dual contract, or wrap broker-dealers to refer clients to DAC.

This has no impact on how DAC executes transactions. DAC will not make commitments to any broker-dealer to compensate that entity through brokerage or other forms of direct or indirect compensation other than as directed under wrap fee arrangements.

Directed Brokerage

Clients may direct DAC to use a particular broker-dealer to execute some or all transactions for the client's account. This brokerage direction must be requested in writing by the client. In such cases, the client will negotiate terms and arrangements for the account with that broker-dealer.

A client who directs DAC to use a particular broker-dealer should consider whether this will result in costs or disadvantages to the client as further described below. As such, a client should satisfy itself that the broker-dealer provides adequate prices and execution of transactions.

If a client directs DAC to place securities transactions through a broker, the client should consider the following factors: (1) the client may compromise DAC's ability to seek best execution; (2) DAC will not attempt to negotiate commissions on the client's behalf which can result in higher commissions, greater spreads or less favorable net prices than would be the case if DAC retained sole discretion to select the brokers; (3) the client's trades may not be aggregated (blocked) with similar trades of other clients' accounts resulting in the client not receiving the volume discounts received by DAC's other clients; (4) the broker selected may not have appropriate capabilities or operational expertise; (5) the client directed broker may not satisfy DAC's broker selection criteria (as described above); and (6) the client account may not generate returns equal to those of DAC's clients who do not have directed brokerage. As a result, clients with directed brokerage may pay higher commissions and/or receive less favorable net prices that might be attained if DAC were able to maintain broker-dealer discretion.

Wrap Fee Programs

As disclosed in Item 4, DAC participates as an investment manager to wrap fee programs. DAC does not sponsor any wrap fee program. In evaluating a wrap fee program, a client should recognize that brokerage transaction costs are generally wrapped in the total fee the client pays to the broker. These are not negotiated through DAC. Trades are executed only with the broker-dealer with which the client has entered into the wrap fee arrangement. DAC, therefore, is not obligated to seek best execution in wrap fee programs. Certain broker-dealers under clients' wrap fee agreements may obtain best overall execution, but DAC makes no assurance that this is accurate. The client should consider that wrap-fees charged by broker-dealers may exceed the aggregate cost of services were they to be provided separately.

Brokerage – Other Economic Benefits

DAC may receive from the trading partners, at no cost to DAC, professional services, computer

software, and related systems' support, enabling DAC to monitor, more closely, client accounts maintained with the broker-dealers. DAC may receive this support at no additional cost because of the portfolio management services rendered to clients who maintain assets with the broker-dealers, not a transaction-based fee. While such access may directly benefit DAC and not the client, DAC endeavors at all times to put the interests of its clients first. DAC's choice of trading partner may be influenced due to these services.

Schwab Adviser Services

DAC's primary, preferred custodian for separately managed accounts is Charles Schwab & Co., Inc. ("Schwab"). DAC may recommend that clients establish brokerage accounts with the Schwab Advisor Services division of Schwab to maintain custody of clients' assets and to effect trades for their accounts. DAC and Schwab are separate, unaffiliated entities. Schwab's commission rates applicable to DAC client accounts were negotiated based on DAC's commitment to maintain DAC clients' account assets custodied by Schwab. This commitment benefits DAC's clients because the overall commission rates clients pay are lower than they would have been if we had not made the commitment. Clients with assets that are held in custody at Schwab generally will pay a lower custody fee or no fee on trades. In the unlikely event that DAC is not able to trade through Schwab, Schwab will charge the account a fee as "prime broker" or "trade away" fee for each trade that DAC executes with a different broker-dealer. These fees are in addition to the commissions clients pay the executing broker-dealer.

Schwab also provides DAC with access to its institutional trading and operations services typically not available to Schwab's retail customers. Schwab services include brokerage, custody, research, access to mutual funds and other investments that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment. Schwab may also make available other services and products such as conferences, consulting, and publications, at no additional cost to DAC.

Trade Aggregation

While not obligated to do so, DAC will block trades where possible and when advantageous to clients. The blocking of trades permits the aggregation of securities for multiple client accounts as long as transaction costs are shared equally on a pro-rated basis. Block trading may allow DAC to execute trades more efficiently. When multiple block trades are placed with multiple brokers, the sequence in which brokers are provided their portion of the block trade is through a rotation where the broker selected to be first will then rotate to the bottom for the next aggregated trade.

Illiquid positions may take multiple days to execute.

Multiple client orders submitted for the same security at different times during the same day with the same broker and side of the trade will receive the average daily price.

Participation or Interest in Client Transactions – Principal Trades

Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells

any security to any advised client. A principal transaction may also be deemed to have occurred when a security is crossed between an affiliated mutual fund and another client account. DAC does not initiate or conduct any principal transactions.

Participation or Interest in Client Transactions – Cross Trades

Cross trading is defined as arranging for one client account to purchase a security directly from another account. Due to potential conflicts of interest and other regulatory requirements, DAC does not engage in cross-trading activities on behalf of any client. This applies to all asset classes.

Item 13: Review of Account

Reviews

DAC's Investment Committee continually monitors and reviews the universe of securities and the strategies. Individual portfolio managers incorporate securities from the investable universe into client portfolios based on each client's investment objectives and risk tolerances. The Committee meets regularly to discuss market trends, research, and other investment and economic conditions.

Individually managed portfolios are reviewed by portfolio managers with consideration for each client's investment objectives and risk tolerances. Portfolio managers will discuss with the client their objectives and risk tolerances at least annually, unless otherwise instructed by the client. Conditions that may necessitate additional reviews include changes in market, political or economic conditions, tax laws, new investment information, and/or changes in a client's financial or life situation.

Reporting

In addition to statements of transactions that clients receive from the broker-dealer and/or custodian, DAC may provide written quarterly reports summarizing account performance, balances, and holdings at no added cost to the client.

Item 14: Client Referrals and Other Compensation

DAC does not have any arrangements where it receives cash or economic benefits from a non-client in connection with giving advice to clients, nor does DAC compensate any non-employee for the referral of new business, other than what has been previously described in Item 12 – Brokerage - Other Economic Benefits.

DAC will sponsor, from its own resources, client activities or events such as fund raisers, golf outings, etc. In addition, DAC, at the discretion of the Executive Management Team, will make charitable contributions when requested by a client.

From time to time, employees attend conferences or workshops sponsored by entities or individuals that have a business relationship with DAC or seek to have a business relationship with DAC. In some cases, registration fees are waived by the sponsor.

DAC makes available to clients the Cantor Fitzgerald Cash management program offered by StoneCastle Network, LLC ("StoneCastle"). This program allows customers to place funds in deposit accounts at banks, savings institutions, and credit unions where such accounts are insured by the Federal Deposit Insurance Corporation ("FDIC") or National Credit Union Administration, whichever is applicable. DAC earns a fee from StoneCastle if clients participate in this program, which gives us an incentive to recommend that you participate in the program.

Item 15: Custody

Management Fee Debiting

Clients may authorize DAC in the Client Advisory Agreement, or in writing at any time, to debit investment management fees directly from the client's account held at an unaffiliated qualified custodian. Having the ability to deduct advisory fees constitutes custody. DAC does not have physical custody of client funds and/or securities.

As part of the advisory fee billing process, the client's custodian is advised of the amount of the fee to be deducted from the client's account. DAC has reasonable belief that each client receives a custodial statement at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to DAC.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact DAC directly if they believe there is an error in their statement.

In addition to the periodic statements that clients receive directly from their custodian, DAC also provides account statements directly to its advised clients on a quarterly basis. DAC urges its clients to carefully compare the information provided on these statements to verify that all holdings and values are correct. Clients may notice a difference in the total value of their account as reported by DAC when compared to the custodian statement values. Custodian statements generally reflect values based on settlement date, while DAC's statements reflect values based on trade date.

Client's Standing Letters of Authorization

As set forth in the SEC No-Action Letter to the Investment Advisers Association, dated February 21, 2017, DAC is deemed to have custody of client assets where the client has a Standing Letter of Authorization ("SLOA"). The SLOA provides instructions from the client to the client's custodian allowing DAC to wire funds from the client's account to another client account or other third-party. DAC does not have the ability to move funds without the client's authorization and the accounts are held by qualified independent banks or broker-dealers. DAC also has a reasonable belief that the custodians provide statements to the client at least quarterly.

Item 16: Investment Discretion

Through the Client Advisory Agreement, DAC receives discretionary authority from each client to select the identity and amount of securities to be bought or sold without obtaining client consent before each trade. DAC may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be provided to DAC in writing.

In all cases, such discretion is to be exercised in a manner consistent with the investment objectives for the particular client account. When selecting securities and determining amounts, DAC observes the investment policies, limitations, and restrictions of the applicable client.

Item 17: Voting Client Securities

DAC has adopted Proxy Voting Policies and Procedures ("Proxy Policies") that require DAC to vote proxies received in a manner consistent with the best interest of its clients. DAC generally exercises proxy voting authority for its clients. In absence of specific voting guidelines from the client, DAC will vote proxies according to DAC's Proxy Policies.

DAC uses BroadRidge - Proxy Edge ("Proxy Edge") to manage the client proxy voting process and engaged Glass Lewis, LLC ("Glass Lewis") proxy voting services to establish an independent source to make proxy voting recommendations on behalf of clients. Except for conflicts, and as also may be noted in the DAC's Proxy Policies, DAC has adopted the Glass Lewis Proxy Paper™ Guidelines - Investment Manager Policy (the "Guidelines") which have been incorporated in DAC's Proxy Policies.

The Guidelines are designed to maximize returns for investment managers by voting in a manner consistent with such managers' active investment decision-making. The Guidelines are also designed to increase an investor's potential financial gain, through the use of the shareholder vote, while also allowing management and the board discretion to direct the operations, including governance and compensation, of the company.

The Guidelines address Management Proposals such as Election of Directors, Auditor, Compensation, and Authorized Shares. For example, the Glass Lewis Investment Manager Guidelines will generally follow the following:

- support the election of incumbent directors except when the majority of the company's directors are not independent;
- support auditor ratification except when the non-audit fees exceed the audit fees paid to the auditor;
- vote against proposals where there would be a creation of a large pool of unallocated shares without some rational of the purpose of such shares;
- support proposals increasing or enhancing shareholder rights.

The Guidelines also address Shareholder Proposals by conducting a case-by-case review. The Guidelines generally support reasonable Governance initiatives. But the Guidelines will generally oppose any shareholder proposals seeking to limit compensation in amount or design. In addition, the Guidelines will generally oppose environmental shareholder proposals

that seek to cease certain practice or take certain actions related to the company's activities or operations.

It should be noted the above examples are not inclusive of all types of ballot items requiring proxy votes by shareholders.

Although many proxy proposals can be voted in accordance with the established Guidelines, DAC recognizes that some proposals require special consideration, which may dictate that DAC's Investment Committee use its best judgement as to what is in the client's best interest.

As mentioned above, Conflicts of Interest are not part of the Guidelines but determined by DAC. Where a conflict of interest exists between DAC and the client regarding a Shareholder Proposal, DAC will request the client's instructions with respect to the vote.

For more information about DAC's proxy polices, please contact DAC's compliance team at complianceteam@dacapitalsc.com or 843-645-9700.

Item 18: Financial Information

DAC has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients.

DAC is not required to provide a balance sheet as DAC does not require prepayment of fees of more than $1,200 per client, and six months or more in advance.